

16. If any question arises as to the propriety of this removal, Hartford respectfully requests the opportunity to present a brief and argument in support of its position.

**WHEREFORE, PREMISES CONSIDERED,** Defendant Hartford Life and Accident Insurance Company, by and through its undersigned counsel, prays that the above action currently pending against it in the Circuit Court of Shelby County, Tennessee, be removed to this Court.

Respectfully submitted this 10<sup>th</sup> day of May, 2017.

/s/ William B. Wahlheim, Jr.

William B. Wahlheim, Jr., BPR#31582  
Grace R. Murphy [*pro hac vice* to be filed]  
Attorneys for Defendant Hartford Life and  
Accident Insurance Company

**OF COUNSEL:**

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Notice of Removal has been served upon the following counsel of record to this proceeding by placing a copy of same in the United States Mail, properly addressed and first-class postage prepaid this 10<sup>th</sup> day of May, 2017:

Sean Antone Hunt, BPR#16159  
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Counsel for Plaintiff

*/s/ William B. Wahlheim, Jr.*  
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OF COUNSEL